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6 UNITED STATES DISTRICT COURT  
7 EASTERN DISTRICT OF WASHINGTON AT RICHLAND

8 JOHN DOE 1; JOHN DOE 2; JANE  
9 DOE 1; JANE DOE 2; JANE DOE 3;  
10 and all persons similarly situated,

11 Plaintiffs,

12 v.

13 WASHINGTON STATE  
14 DEPARTMENT OF CORRECTIONS;  
15 STEPHEN SINCLAIR, Secretary of The  
16 Department of Corrections, in his official  
17 capacity,

18 Defendants,

19 and

20 BONNEVILLE INTERNATIONAL,  
21 INC. a Utah Corporation, d.b.a KIRO  
22 Radio 97.3 FM; THE MCCLATCHY  
23 COMPANY, LLC, a California Limited  
Liability Company, d.b.a. The Tacoma  
News Tribune; and ANDREA KELLY,  
an individual,

Interested Parties.

No. 4:21-cv-05059-TOR

DECLARATION OF JOHN DOE 1

I, [REDACTED] declare and state as follows:

1           1.     I am over the age of 18 and competent to make this declaration. I live  
2 in Franklin County, Washington.

3           2.     I am incarcerated in the Coyote Ridge Corrections Center.

4           3.     The Department of Corrections (DOC) has a lot of really private  
5 information about me. If people knew this information, and it were out in public,  
6 that could put me in danger in the prison and in the community. They have  
7 information that identifies me as transgender, and whether I am vulnerable to  
8 sexual assault and why that might be the case due to my mental health and medical  
9 status. This information is highly personal and private. It should not be disclosed  
10 to others. If it were disclosed it would be embarrassing to me. It would also make  
11 me more of a target for harassment, sexual assault, and other forms of violence in  
12 prison and the community. If DOC shared this information it would also be sharing  
13 personal information about my medical and mental health history and services I  
14 have received while in DOC.

15          4.     The purpose of this lawsuit is to save me from the embarrassment and  
16 harm that will result if my personal information is disclosed. As discussed here, I  
17 have significant concerns about my privacy and safety if my identity and  
18 information were released to the public. I am concerned that my name being used  
19 in connection with this lawsuit will have the actual result of disclosing the personal  
20 information that I am seeking to keep private. I also have concerns that DOC and  
21 its staff, the requestors, and the public would subject me to retaliation or ridicule if  
22 my name were used in this action. For these reasons, and those stated above, I  
23 desire to proceed anonymously.

1 I declare under penalty of perjury under the laws of the United States of  
2 America the foregoing statements are true and correct.

3 Dated this 5<sup>th</sup> day of April 2021 at [REDACTED] [REDACTED] Washington.  
4

5 [REDACTED]  
6 [REDACTED]

7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]